



CHIESA SHAHINIAN & GIANTOMASI PC

11 TIMES SQUARE, 34TH FLOOR
NEW YORK, NY 10036

csglaw.com

DANIEL D. BARNES
dbarnes@csglaw.com
(O) 973.530.2097
(F) 973.530.2297

January 28, 2022

Via ECF AND EMAIL

The Honorable Andrew L. Carter, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007
ALCarterNYSDChambers@nysd.uscourts.gov

Re: Alexander Gerding v. American Kennel Club, et al.
Civil Action No.: 1:21-cv-07958 (ALC)

Dear Judge Carter:

This firm represents Defendants North American Diving Dogs ("NADD") and Debra Markwardt (collectively, "the NADD Defendants") in the above captioned action. We write with respect to the upcoming pre-motion conference concerning the NADD Defendants and the American Kennel Club ("AKC") Defendant's anticipated motions to dismiss (ECF Nos. 46, 48, 51-52), currently scheduled for February 2, 2022.

With the consent of all parties, the NADD Defendants respectfully request an adjournment of the pre-motion conference. Unfortunately, I am committed to conducting a deposition on February 2, 2022 in a matter currently scheduled for a March 14, 2022 trial. Counsel for AKC asked that I advise the Court that he is on trial on February 11 and 17, 2022. Plaintiff Pro Se asked that I advise the Court that he is available any day after February 11, 2022.

We thank Your Honor for your attention to this matter.

Respectfully submitted

/s/ Daniel D. Barnes

Daniel D. Barnes

c: Alexander Gering via electronic mail (Gerding45@gmail.com)
All Counsel of Record (via electronic filing)